

FACT SHEET

DRAFT HMWA/RCRA PARTIAL-CLOSURE PLANS FOR THE TEST REACTOR AREA CATCH TANK SYSTEM, P-7 EXPERIMENTAL WATER LOOP SYSTEM, AND THE TRA/ETR HOT WASTE SYSTEM, ALL LOCATED AT THE TEST REACTOR AREA ON THE IDAHO NATIONAL LABORATORY EPA ID NO. ID4890008952

This fact sheet sets forth the principal facts pertaining to three draft partial-closure plans the Idaho Department of Environmental Quality (DEQ) is proposing to approve. The partial-closure plans set forth the applicable closure requirements the DEQ intends to require of the United States Department of Energy (DOE) associated with these systems.

This fact sheet was prepared in accordance with the requirements of the Rules and Standards for Hazardous Waste, IDAPA 58.01.05.000 et. seq., specifically, IDAPA 58.01.05.009 [40 CFR § 265.112(d)(4)].

A. PURPOSE OF THE CLOSURE PLANS

Closure plans designate specific administrative and procedural requirements the owner/operator must comply with in accordance with the Idaho Hazardous Waste Management Act (HWMA) of 1983, as amended. DEQ reviewed, revised, and now proposes to approve the draft partial closure plans to close the Test Reactor Area (TRA) Catch Tank System, the Engineering Test Reactor (ETR) P-7 Experimental Water Loop System, and the TRA/ETR Hot Waste System located at the Idaho National Laboratory (INL).

B. PROCEDURES FOR REACHING A FINAL DECISION

IDAPA 58.01.05.009 [40 CFR § 265.112(d)(4)] requires that the public be given 30 calendar days to comment on the draft closure plans presented for approval under the HWMA. The comment period will begin on June 27, 2005, and will end on July 27, 2005. Any person interested in commenting on these plans must do so within this 30-calendar day comment period.

In response to specific requests and at the discretion of the Director of the DEQ, a public hearing may be provided whenever such a hearing might clarify one or more issues concerning the Draft Closure Plans. Written requests for a hearing may be submitted personally or sent to the address below, and must be received on or before July 27, 2005.

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All persons wishing to comment on the partial-closure plan's conditions should submit comments in writing to:

*Mr. Robert Bullock
c/o Teri Gregory
Waste Management and Remediation Division
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706-1255*

Comments should include all reasonable available references, factual grounds, and supporting material.

When making the final determination regarding the requested approval of these partial-closure plans, the DEQ will consider all written comments received during the public comment period, comments received during the public hearing (if held), the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 et seq., and all other applicable federal, state, or local laws.

C. FACILITY/UNIT DESCRIPTION

TRA-630 Catch Tank System

The Catch Tank System is located at the TRA on the INL. The system was constructed in 1951 to support test reactor operations at the TRA. In 1986, the direct-buried tanks were removed and replaced with new tanks protected in a concrete vault. The system was taken out of service in 1991. The entire system is not addressed in this Closure Plan. That portion of the system to be closed is shown in the Closure Plan on Schematic P-VCO-5.8.d-RCP-630, Sheets 1 & 2. Until the remainder of the Catch Tank System undergoes closure, it will be subject to the June, 2000, Voluntary Consent Order.

TRA/ETR P-7 Experimental Water Loop System

The P-7 system is located in the ETR building at the TRA on the INL. It provided an irradiation facility for a variety of nuclear experiments conducted in the ETR, which operated from 1957 to 1981. The only component of the P-7 Experiment Loop System subject to closure is an ion exchange column (6-gallon capacity) designated as ID #98TRA00510 on Schematic P-CLOS-ST005-TRA-023 in the Closure Plan.

TRA/ETR Hot Waste System

The ETR Hot Waste System is located in the basement of the ETR building at the TRA on the INL. During ETR operation the Hot Waste System collected and temporarily stored radioactive

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liquid waste prior to disposal in other TRA liquid waste systems. The only portion of the system that will be closed is Hot Waste Tank TRA-642-2

D. CLOSURE ACTIVITIES

TRA-630 Catch Tank System

Closure activities include characterizing, removing and sending liquid and solid wastes to an appropriate treatment, storage, and disposal facility (TSDF). Any contaminated soil associated with the portion of the Catch Tank System being closed will be decontaminated or removed. Following removal of wastes the tanks, tank vault, piping and ancillary equipment will be decontaminated to the closure performance standards outlined in the Closure Plan. A registered professional engineer will observe closure activities and/or review documentation prior to certifying that the closed portion of the Catch Tank System meets the clean closure performance standards. If these standards cannot be met, the Catch Tank System will be subject to closure as a landfill in accordance with the Contingent Landfill Closure Plan.

P-7 Experimental Water Loop System

Closure activities will include removal of the ion exchange column and ancillary piping and disposal of the waste at an appropriate TSDF. The liquid hazardous waste was removed and put in permitted storage in October, 2004. A registered professional engineer will observe closure activities and/or review documentation prior to certifying that the closed portion of the P-7 Experimental Water Loop System meets the clean closure performance standards outlined in the Closure Plan.

TRA/ETR Hot Waste System

The Hot Waste Tank currently contains 500 gallons of liquid. Closure activities include disposing of the liquid as low level radioactive waste in other TRA liquid waste systems and removing the Hot Waste Tank and sending it and the hazardous sediment in the bottom of the tank to an appropriate TSDF. A second option is to remove the sediment and send it to an appropriate TSDF. The empty Hot Waste Tank would receive a hazardous waste determination and then be disposed of in accordance with applicable regulations. Either option will fulfill the clean closure performance standards outlined in the Closure Plan. A registered professional engineer will observe closure activities and/or review documentation prior to certifying that the closed portion of the P-7 Experimental Water Loop System meets the clean closure performance standards outlined in the Closure Plan.

E. CLOSURE SCHEDULE

Closure of the TRA Catch Tank System will take longer than the 180-day time frame. In accordance with the provisions of IDAPA 58.01.05.009 [40 CFR § 265.113] an extension has been requested and is hereby proposed for approval. The complete closure of the TRA Catch Tank System is estimated to take two years. DEQ proposes to accept this schedule provided the facility submits quarterly progress reports to DEQ and continues to conduct appropriate inspection activities until the system is certified closed.

The P-7 Experimental Water Loop System and the TRA/ETR Hot Waste System will be closed within the 180-day closure period as specified in IDAPA 58.01.05.009 [40 CFR § 265.113(b)].

F. CLOSURE PLAN ORGANIZATION

The closure plans are organized as follows:

TRA Catch Tank System

<i>SECTION</i>	<i>TITLE</i>
1	INTRODUCTION
2	FACILITY DESCRIPTION
3	TRA-630 CATCH TANK SYSTEM CURRENT AND MAXIMUM WASTE INVENTORIES
4	TANK SYSTEM CLOSURE OF THE TRA-630 CATCH TANK SYSTEM
5	TIME ALLOWED/EXTENSION
6	CLOSURE PLAN AMENDMENTS
7	CERTIFICATION OF CLOSURE
8	COST AND LIABILITY REQUIREMENTS
9	REFERENCES
10	DRAWINGS
<i>APPENDIX</i>	<i>TOPIC</i>
A	SCHEMATICS
B	DEVELOPMENT OF ACTION LEVELS FOR THE TRA-630 CATCH TANK SYSTEM

P-7 Experiment Water Loop System

<i>SECTION</i>	<i>TITLE</i>
1	INTRODUCTION
2	FACILITY DESCRIPTION
3	CURRENT AND MAXIMUM WASTE INVENTORY AND CHARACTERIZATION
4	CLOSURE PERFORMANCE STANDARDS
5	CLOSURE SCHEDULE
6	CLOSURE PLAN AMENDMENTS
7	CERTIFICATION OF CLOSURE
8	CLOSURE PLAN AMENDMENTS
9	REFERENCE
10	DRAWING
<i>APPENDIX</i>	<i>TOPIC</i>
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TRA/ETR Hot Waste System

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